

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

CONSUMER FINANCIAL PROTECTION  
BUREAU; COMMONWEALTH OF  
MASSACHUSETTS; THE PEOPLE OF  
THE STATE OF NEW YORK, by LETITIA  
JAMES, Attorney General of the State of  
New York; and COMMONWEALTH OF  
VIRGINIA, *EX REL.* MARK R. HERRING,  
ATTORNEY GENERAL,

Plaintiffs,

v.

NEXUS SERVICES, INC., LIBRE BY  
NEXUS, INC., MICHEAL DONOVAN,  
RICHARD MOORE, and EVAN AJIN,

Defendants.

Case No.: 5:21-cv-00016-EKD

**MOTION FOR LEAVE TO WITHDRAW**

I, Erin B. Ashwell, Chief Deputy Attorney General for the Commonwealth of Virginia *ex rel.* Mark R. Herring, Attorney General (“Commonwealth”), request that this court permit me to withdraw as counsel of record for good cause shown, and state the following in support thereof:

1. As of January 15, 2022, I will no longer serve as the Chief Deputy Attorney General and will no longer be employed by the Commonwealth of Virginia.
2. Senior Assistant David B. Irvin and Assistant Attorney General Erin E. Witte, both admitted to this Court, have each made an appearance in this matter as additional counsel of record, will continue to represent the Commonwealth, and agree to

continue to co-sponsor Jon Burke, Stewart Dearing, Joseph Mueller, Laura Levine and Jane Azia, each of whom were admitted *pro hac vice* in this matter.

WHEREFORE, I respectfully move this Court for entry of an Order granting me leave to withdraw as counsel of record in this case.

Dated: January 14, 2022

Respectfully submitted,

/s/Erin B. Ashwell

Virginia Bar Number: 79538

*Attorneys for the Commonwealth of Virginia, ex rel.  
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Mark R. Herring

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